MOP000000104 Emerglermit

MAR 2 4 1982

Facility EPH IO No. MOD 007152903

Mr. Ron Enos President, Advanced Circuitry Division Litton Industries Incorporated P.O. Box 2847 Springfield, Missouri 65803

Dear Mr. Enos:

This is to confirm the issuance of an Emergency Resource Conservation and Recovery Act (RCRA) permit to Litton Systems, Incorporated at 4811 Kearney, Springfield, Missouri for the land treatment and removal of liquids from the storage lagoon onto the land. The permit number issued is MOPO00000104. The conditions for which the wastewater from the storage lagoon (A pond) will be applied to the land owned by Litton Industries, Incorporated are as follows:

- 1. Litton Advanced Circuitry Division (ACD) shall discharge as much wastewater as possible and acceptable to the Springfield city sewer until Pond A is lowered at least three (3) feet.
- 2. As an alternate to paragraph (1) and as may be necessary to achieve desired lagoon level reductions, wastewater from Pond A shall be applied by spray irrigation on ACD property (30 acres more or less available for spray irrigation) at a rate of approximately 1/4 inch per day until Pond A level is lowered at least three (3) feet.
- 3. Wastewater shall not be applied directly to any known sinkholes on the property.
- 4. A final decision on the adequacy of lowering the level of the pond three feet will be made by the Missouri Department of Natural Resources (MDNR) after that action is completed. The MDNR may request that additional wastewater be removed from Pond A if it is seen that three feet is not adequate to stablize the lagoon.
- 5. Litton ACD shall hire its own geotechnical engineer experienced with dam design to evaluate the stability of the lagoon berms and the surrounding topography. Confirmation that this has been accomplished shall be provided to the MDNR by March 22, 1982.
- 6. Litton ACD shall report to the MDNR Springfield Regional Office on a daily basis advising the Department of their progress. A log of all actions taken by Litton regarding this project shall be maintained and provided the MDNR on a weekly basis. The MDNR can be reached in the event of an emergency at (314) 634-2436 (24 hour number).

ARWM/WMBR-PMTS: MPerry-Williams: DDegner: lmh:x6531:3-23-82: Disk B

CONCURRENCES

SYMBOL PMTS PMTS PMTS ARWM ARWM RGAD

SJRNAME Perry-Wms Degner Harrington Morby Spratlin Vagoner

LATE WAS ARWM OF WAGONER BK4/82

EPA Form 1320-1 (12-70)

OFFICIAL FILE COPY



- 7. Litton shall analyze the quality of the wastewater within four days from the date of this permit to determine if the wastewater effluent is hazardous or whether it is non-hazardous. Report by telephone those results to Mr. Robert Morby of my staff no later than March 30, 1982, at 2 p.m. These results will be used to determine whether the above conditions will be retained or modified.
- 8. It is recommended that Litton analyze the application site soils for background levels of heavy metals.
- 9. Litton shall not take any action not expressly specified in this directive unless prior approval is given by MDNR or the Environmental Protection Agency (EPA).

The permit shall be effective as of March 19, 1982, and shall be in effect until April 4, 1982.

If you have any questions, please contact Robert L. Morby, Chief, Waste Management Branch at (816) 374-6531.

Sincerely yours,

John J. Franke, Jr. Regional Administrator

cc: Robert J. Schreiber, Jr., MDNR

bcc: Michael Sanderson, AWCM

PUBLIC NOTICE

THE U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION VII, 324 EAST 11th STREET, KANSAS CITY, MISSOURI, ISSUED AN EMERGENCY RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) PERMIT TO THE LITTON SYSTEMS, INCORPORATED, SPRINGFIELD, MISSOURI ON MARCH 19, 1982, TO BE EFFECTIVE UNTIL APRIL 4, 1982.

An Emergency RCRA Permit was issued to Litton Systems, Incorporated, 4811 Kearney, Springfield, Missouri for the removal and land treatment of wastewater from the storage lagoon onto the land.

The storage area and treatment process will be secured and monitored by the Missouri Department of Natural Resources, to assure all necessary precautions have been taken to protect human health and the environment.

Lynn: coordente Grove.

ARWM/WMBR-PMTS:MPerry-Williams:1mh:x6531:3-22-82:Disk B

CONCURRENCES

SYMBOL PMTS MMER

SURNAME Perry-Wms Harrington Morby

DATE 3/3/3/3 3/2/482 3/2/81

EPA Form 1320-1 (12-70)

OFFICIAL FILE COPY

Standard Form No. 1143

ADVERTISING ORDER

KO121NNLX ORDER NUMBER

U.S. Enviornmental Protection Agency, Region VII

March 19, 1982

The publisher of the publication named below is authorized to publish the enclosed advertisement according to the schedule below provided the rates are not in excess of the commercial rates

charged to private individuals with the usual discounts. It is to be set solid, without paragraphing, and without any display in the heading unless otherwise expressly authorized in the specifications.

NAME OF THE PUBLICATION ADVERTISED IN

Springfield Newspaper Inc.

SUBJECT OF ADVERTISEMENT Public Notice

EDITION OF PAPER ADVERTISEMENT APPEARED

Weekly

NUMBER OF TIMES ADVERTISEMENT APPEARED

MCCKTA

One time only

DATE(s) ADVERTISEMENT APPEARED

11,641

spear the 26thofword

SPECIFICATIONS FOR ADVERTISEMENT

Please submit two copies of proof of publication

COPY FOR ADVERTISEMENT

See attached Public Notice of EPA Issuance of Emergency Permit to Litton Industries, Inc., Springfield, Missouri.

The permit was issued under the following permit reference number: MOP000000104.

AUTHORITY TO ADVERTISE	INSTRUMENT OF ASSIGNMENT
NUMBER	NUMBER
Delegations Manual 1-1-A(C3)	N/A
march 22,198)	DATE
SIGNATURE OF AUTHORIZING OFFICIAL	Chief, Support Services Section
	VARIETY OF INSTRUMENT UNDER THOSE ACTION AND THE SECOND FROM T

INSTRUCTIONS TO PUBLISHERS

Extreme care should be exercised to insure that the specifications for advertising to be set other than solid be definite, clear, and specific since no allowance will be made for paragraphing or for display or leaded or prominent headings, unless specifically ordered, or for additional space required by the use of type other than that specified. Specifications for advertising other than solid and the advertisement copy submitted to the publisher will be attached to the voucher. The following is a sample of solid line advertisement set up in accordance with the usual Government requirements.

DEPARTMENT OF HIGHWAYS & TRAFFIC, D.C. Bids are requested for first spring 1966 cement concrete repair contract, including incidental work, Washington, D.C., Invitation No. C-6576-H, consisting of 11,000 sq. yds. PCC Class BB sidewalk repair and 2,000 cu. yds. PCC Class BA pavement, alley, & driveway repair, both cut repairs only. Bidding material available from the Procurement Officer, D.C. Sealed bids to be opened in the Procurement Office at 3:00 p.m., November 15, 1965.

Your bill for this advertising order should be submitted on the "Public Voucher for Advertising" form, which is printed on the reverse of this form, immediately after the last publication of the advertisement. If copies of the printed advertisement are not available, complete the affidavit provided on the voucher. Submit the voucher and a copy of the printed advertisement to . EPA......

324 East 11th Street

Kansas City, Missouri 64106

THRU: Robert L. Morby

Chief, Waste Management Branch IMPORTANT Air and Waste Management Division

Charges for advertising when a cut, matrix, stereotype or electrotype is furnished will be based on actual space used and no allowance will be made for shrinkage.

In no case shall the advertisement extend beyond the date and edition stated in this order.

CCW349

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25.40 Jma

Est: \$ 60.00

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1143-107

PUBLIC NOTICE

THE U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION VII, 324 EAST 11TH STREET, KANSAS CITY, MISSOURI, ISSUED A REVISED EMERGENCY RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) PERMIT TO THE LITTON SYSTEMS, INCORPORATED, SPRINGFIELD, MISSOURI ON APRIL 2, 1982, TO BE EFFECTIVE UNTIL APRIL 30, 1982.

The revised Emergency RCRA Permit was issued to Litton Systems, Incorporated, 4811 Kearney, Springfield, Missouri for the removal and land treatment of wastewater from the storage lagoon onto the land.

The storage lagoon and treatment process will be secured and monitored by the Missouri Department of Natural Resources, to assure all necessary precautions have been taken to protect human health and the environment.

ARWM/WMBR-PMTS:MPerry-Williams:lmh:x6531:4-2-82:Disk B

CONCURRENCES

SYMBOL PMTS PMTS WMBR

SURNAME Perry-Wms Harringtony Morby

DATE 4282 4780 4782 6782

EPA Form 1320-1 (12-70)

OFFICIAL FILE COPY

September 1973 4 Treasury FRM 2000

Standard Form No. 1143

ADVERTISING ORDER

K0129NNLX ORDER NUMBER

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE

DATE

U.S. Enviornmental Protection Agency, Region VII

<u> April 2, 1982</u>

The publisher of the publication named below is authorized to publish the enclosed advertisement according to the schedule below provided the rates are not in excess of the commercial rates

charged to private individuals with the usual discounts. It is to be set solid, without paragraphing, and without any display in the heading unless otherwise expressly authorized in the specifications.

NAME OF THE PUBLICATION ADVERTISED IN

Springfield Newspaper Inc.

SUBJECT OF ADVERTISEMENT

Public Notice

Number of times advertisement appeared

One time only

Weekly

Date(s) advertisement appeared

Nexture only

One time only
SPECIFICATIONS FOR ADVERTISEMENT

Please submit two copies of proof of publication

COPY FOR ADVERTISEMENT

See attached Public Notice of EPA Issuance of a revised Emergency Permit to Litton Industries, Inc., Springfield, Missouri.

The permit was issued under the following permit reference number: MOP000000104.

AUTHORITY TO ADVERTISE	INSTRUMENT OF ASSIGNMENT
NUMBER	NUMBER
Delegations Manual 1-1-A(C3)	N/A
DATE 4/2/82	DATE
SIGNATURE OF AUTHORIZING OFFICIAL	TITLE
Company Summer	Chief, Support Services Section

INSTRUCTIONS TO PUBLISHERS

Extreme care should be exercised to insure that the specifications for advertising to be set other than solid be definite, clear, and specific since no allowance will be made for paragraphing or for display or leaded or prominent headings, unless specifically ordered, or for additional space required by the use of type other than that specified. Specifications for advertising other than solid and the advertisement copy submitted to the publisher will be attached to the voucher. The following is a sample of solid line advertisement set up in accordance with the usual Government requirements.

DEPARTMENT OF HIGHWAYS & TRAFFIC, D.C. Bids are requested for first spring 1966 cement concrete repair contract, including incidental work, Washington, D.C., Invitation No. C-5576-H, consisting of 11,000 se, yds. PCC Class BB sidewalk repair and 2,000 cu. yds. PCC Class A pavement, alley, & driveway repair, both cut repairs only. Bidding material available from the Procurement Officer, D.C. Sealed bids to be opened in the Procurement Office at 8:00 p.m., Novembor 15, 1965.

Your bill for this advertising order should be submitted on the "Public Voucher for Advertising" form, which is printed on the reverse of this form, immediately after the last publication of the advertisement. If copies of the printed advertisement are not available, complete the affidavit provided on the voucher. Submit the voucher and a copy of the printed advertisement to

EPA

324 East 11th Street

Kansas City, Missouri 64106

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THRU: Robert L. Morby

Chief, Waste Management Branch

IMPORTANT Air and Waste Management Division

Charges for advertising when a cut, matrix, stereotype or electrotype is furnished will be based on actual space used and no allowance will be made for shrinkage.

In no case shall the advertisement extend beyond the date and edition stated in this order.

Est. \$6000

14. 强 Springfiald Newspaper Inc. 651 Borneville Springfield Trissouri

MOPDO0000104

APR 5 1982

Mr. Ron Enos President, Advanced Circuitry Division Litton Industries Incorporated P.O. Box 2847 Springfield, Missouri 65803 EPA I.D. No.: MOD007152903

FACILITY LOCATION: 4811 Kearney Springfield, Missouri 65803

Dear Mr. Enos:

Enclosed is a revision to emergency permit MOPO00000104, issued to your firm on March 24, 1982. This permit, as revised, is effective immediately and replaces the conditions specified in our letter and permit of March 24.

In accordance with recent discussions with the Missouri Department of Natural Resources, we agree that significant potential exists for catastrophic sinkhole collapse in the bottom of your firm's storage lagoon (Pond A). Since it is imperative to minimize the hazard to the vicinity groundwater, the Advanced Circuitry Division of Litton Industries, Incorporated is hereby authorized and directed to discharge and treat the wastewater contained in Pond A in accordance with the following conditions:

- 1. Litton Advanced Circuitry Division (ACD) shall discharge as much wastewater as possible and acceptable to the Springfield city sewer until all liquid portions are removed from Pond A.
- 2. As an alternate to paragraph (1), and as may be necessary to empty the lagoon, wastewater from Pond A shall be applied by spray irrigation on Litton ACD property (30 acres more or less available for spray irrigation) at a rate of approximately one-third inch per day.
- 3. Wastewater shall not be applied directly to any known sinkholes on the property.
- 4. Removal of the liquid portion of the lagoon reduces the danger of a catastrophic collapse of Pond A. However, hazardous sludge and contaminated soil will remain in the lagoon bottom posing a threat to groundwater if a sinkhole should develop in the lagoon bottom. For that reason, Litton ACD is hereby ordered to submit to the Waste Management Branch, for approval, a revised closure plan specifically addressing removal of the sludge and contaminated soil. This plan shall include a revised timetable and shall be submitted by April 15, 1982.

ARWM/WMRR-PMTS:MPerry-Williams:Dennis Degner:1mh:x6531:4-2-82:Disk B CONCURRENCES RGAD SYMBOL ARWM PMTS PMTS WMBR PMTS Wagoner Degner Spratlin SURNAME DATE 5 /82 EPA Form 1320-1 (12-70) OFFICIAL FILE COPY mg 4/2/82

6. Litton shall not take any action not expressly specified in this permit unless prior approval is given by MDNR or the Environmental Protection Agency (EPA). In the event of an emergency, Agency personnel can be contacted at (816) 374-3778 (24-hour number).

This emergency permit will expire on April 30, 1982, unless the U.S. EPA, Region VII finds it necessary to terminate it sooner in order to protect human health or the environment. This permit does not preclude Litton ACD from complying with other state or federal laws and regulations.

Sincerely yours,

John J. Franke, Jr. Regional Administrator

cc: Robert J. Schreiber, Jr., MDNR

bcc: Michael Sanderson, AWCM Bill Keffer, EP&R Karen Flournoy, ARWM/WMBR



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII 324 EAST ELEVENTH STREET KANSAS CITY, MISSOURI - 64106

APR 5 1982

OFFICE OF THE REGIONAL ADMINISTRATOR

Mr. Ron Enos President, Advanced Circuitry Division Litton Industries Incorporated P.O. Box 2847 Springfield, Missouri 65803 EPA I.D. No.: MODO07152903

FACILITY LOCATION:

4811 Kearney Springfield, Missouri 65803

Dear Mr. Enos:

Enclosed is a revision to emergency permit MOPO00000104, issued to your firm on March 24, 1982. This permit, as revised, is effective immediately and replaces the conditions specified in our letter and permit of March 24.

In accordance with recent discussions with the Missouri Department of Natural Resources, we agree that significant potential exists for catastrophic sinkhole collapse in the bottom of your firm's storage lagoon (Pond A). Since it is imperative to minimize the hazard to the vicinity groundwater, the Advanced Circuitry Division of Litton Industries, Incorporated is hereby authorized and directed to discharge and treat the wastewater contained in Pond A in accordance with the following conditions:

- 1. Litton Advanced Circuitry Division (ACD) shall discharge as much wastewater as possible and acceptable to the Springfield city sewer until all liquid portions are removed from Pond A.
- 2. As an alternate to paragraph (1), and as may be necessary to empty the lagoon, wastewater from Pond A shall be applied by spray irrigation on Litton ACD property (30 acres more or less available for spray irrigation) at a rate of approximately one-third inch per day.
- 3. Wastewater shall not be applied directly to any known sinkholes on the property.
- 4. Removal of the liquid portion of the lagoon reduces the danger of a catastrophic collapse of Pond A. However, hazardous sludge and contaminated soil will remain in the lagoon bottom posing a threat to groundwater if a sinkhole should develop in the lagoon bottom. For that reason, Litton ACD is hereby ordered to submit to the Waste Management Branch, for approval, a revised closure plan specifically addressing removal of the sludge and contaminated soil. This plan shall include a revised timetable and shall be submitted by April 15, 1982.

- 5. Litton ACD shall provide to Mr. Robert Morby, Chief, Waste Management Branch a log of all actions taken by Litton regarding this project. This log shall be maintained and provided to this office on a weekly basis.
- 6. Litton shall not take any action not expressly specified in this permit unless prior approval is given by MDNR or the Environmental Protection Agency (EPA). In the event of an emergency, Agency personnel can be contacted at (816) 374-3778 (24-hour number).

This emergency permit will expire on April 30, 1982, unless the U.S. EPA, Region VII finds it necessary to terminate it sooner in order to protect human health or the environment. This permit does not preclude Litton ACD from complying with other state or federal laws and regulations.

Since rely your

Regional Administrator

Robert J. Schreiber, Jr., MDNR

File Emergency Permit MOP000000104

(Cross Reference) MODO07152903

DVANCED CIRCUITRY

P. O. Box 2847, Commercial Station, Springfield, Mo. 65803 417 862-0751

April 13, 1982

RECEIVED

APR 1 5 1982

Mr. John J. Franke Regional Administrator U.S. Environmental Protection Agency Region VII 324 E. 11th Kansas City, Missouri 64106

CONSTRUCTION GRANTS BRANCH WATER DIVISION

Dear Mr. Franke:

Please find enclosed our revised closure plan which was originally submitted on March 17, 1982 for closure of our surface impoundment in Springfield, Missouri. This revised plan reflects the necessary steps taken to meet the requirements set forth in the March, 1982 Eminent Hazard Status issued to Advanced Circuitry by the Missouri Department of Natural Resources. It is also felt that our closure plan meets the requirements contained in the July 1, 1981 40 Code · of Regulations Part 265, Subpart G, Closure and Post Closure.

In your letter of April 7, 1982, you stated several questions which I will now try to address.

- 1) A general description of our surface impoundment is as follows: Earthen construction 450' long by 450' wide by an average depth of 9½' which holds a volume of approximately 12 million gallons of waste water. At this time, our lagoon is holding approximately 8½ million gallons of water with the remaining 3½ million gallons already being pumped into the Springfield Sewer System or irrigated.
- 2) Please find enclosed a schematic showing our various treatments of plant effluent prior to discharge to 1) city sewer or 2) filter press for sludge removal.
- 3) At this time, our plan for groundwater monitoring is still pending approval by the Missouri Department of Natural Resources.

I would like to point out once again that by our present schedule of closure, the groundwater monitoring system would only be used for approximately 120 days maximum before its use is terminated.

4) We currently have hired the consulting firm of Hood-Rich of Springfield, Missouri to oversee our closure operation. It will be this firm who will certify that our closure was completed

ARHM/SWMG APR 1 9 1982

ion VII K.C., MO

Mr. John J. Franke April 13, 1982

Page 2

in accordance with our approved closure plan. Currently Hood-Rich is estimating an on-site inspection on a bi-weekly basis.

If you have any questions regarding our closure plan, please contact me at your convenience.

Sincerely yours,

David Edwards

Facilities Manager

cc: Paul Meiburger

Environmental Engineer I

Missouri Dept. of Natural Resources

P.O. Box 1368

Jefferson City, Missouri 65102

Subpart G - Closure and Post Closure

265.111 Closure and Post Closure

A. Owner shall close facility in a manner to minimize all hazards.

265.112 Closure Plan

- A. In March, 1982, the city sewer system was available for hookup and Litton began its use for effluent discharge. At that time, Litton discontinued discharging effluent waters to A pond. Due to the DNR Eminent Hazardous Action of March, 1982, it is expected that the waste water in A pond may be removed by May 1, 1982. At this time, we will begin closure on approximately May 10, 1982.
- B. Based on calculations, approximately 1800 cubic yards of sludge will have accumulated and will be removed to a hazardous waste site. A plan submitted by the contractor, O.H. Materials Company, has been submitted and is included in this report.
- C. Decontamination of equipment will include wash-down within the pond itself.
- D. Actual closure will start in May, 1982, and will take approximately 2 months of excavation and loading time. Final closure will consist of grading over and seeding of the site.

265.113 Time Allowed for Closure

- A. Closure is to take place within 180 days of last receipt of wastes.
- B. We may apply to Regional Administrator for longer closure time.

265.114 Disposal or Decontamination of Equipment

A. All the equipment and structures used in the closure shall be properly disposed of or decontaminated by high pressure water spray.

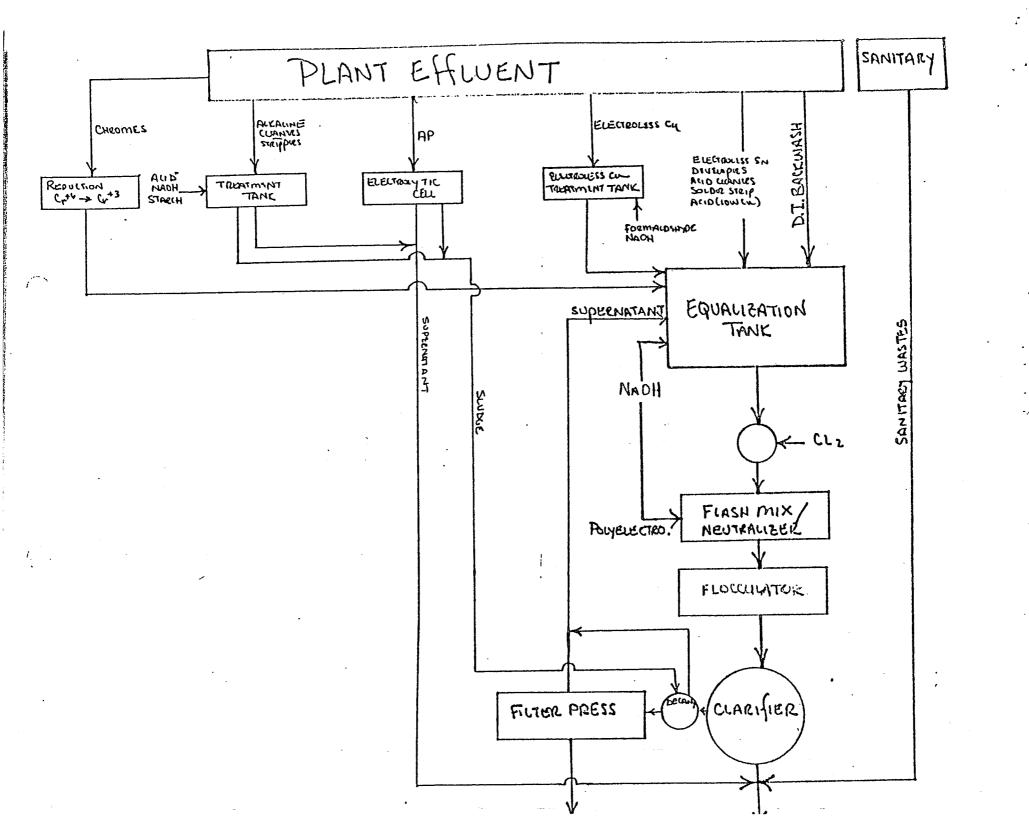
265.115 Certification of Closure

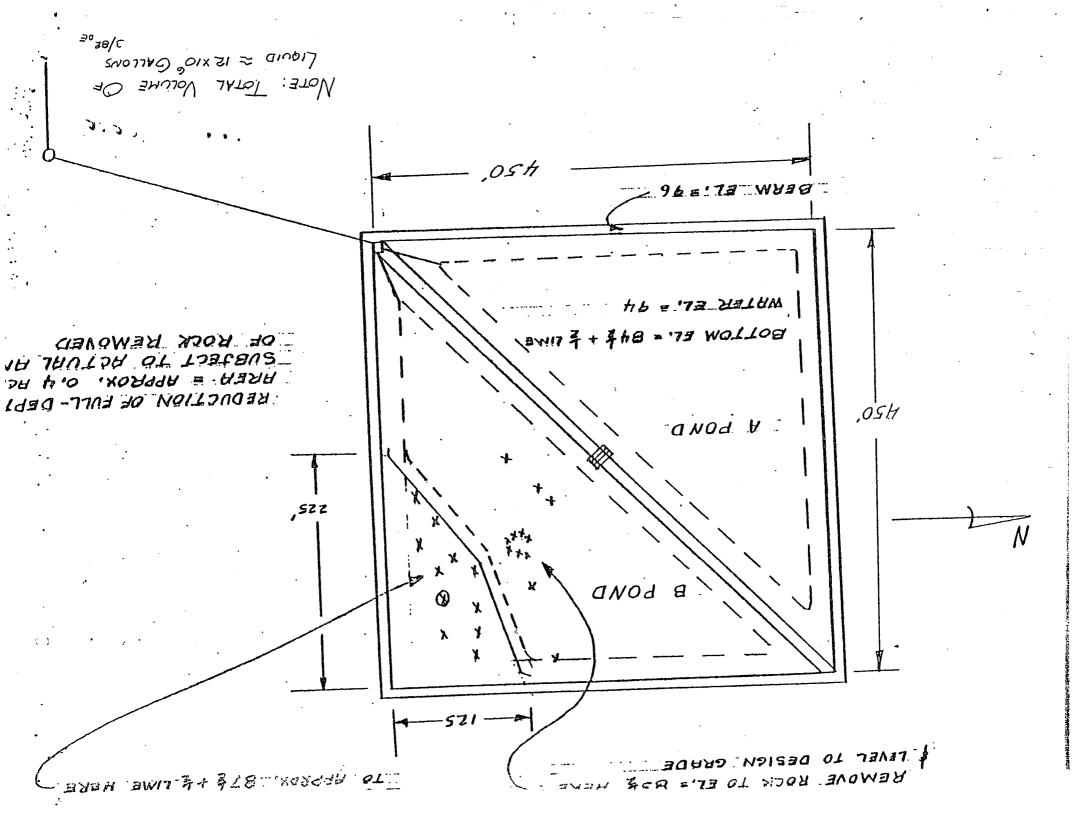
- A. Upon closure, Litton shall submit to the Regional Director certification thereof signed by the operator and an independent professional registered engineer.
- B. Expected certification date is August, 1982.

Subpart H - Financial Requirements

265.142 Cost Estimate for Facility Closure

A. Litton has developed closure costs for facilities for \$465,000 per contract.





O. H. Jenerials Co.

Emergency Raco (1935) Lancanmental Restoration

may c

Regional Offices
Ottawa, Illinois
Atlanta, Georgia
Washington, D.C.

P. O. Box 551 Findlay, Ohio 45840 Telephone (419) 423-3526 1-800-537-9540

January 26, 1982

Mr. George Copeland Facilities Manager Litton Advanced Circuitry 4811 West Kearney Springfield, MO 65803

Dear Mr. Copeland:

For this project, we recommend using our Sharples P 5000 Horizontal Super-D Canter as the most cost-effective method of disposing of the pond's sludge contents.

Laboratory tests on samples provided by Litton indicated that the original material containing 10% solids (1 part. solid - 9 parts water) could be readily centrifuged. Centrifugation resulted in products containing 50% solids (1 part solid - 1 part water) and a clear supernatent liquid (8 parts water).

Based on past experience, this 50% solid material plus 25% fly ash, or lime, should easily meet landfill requirements for a solid material.

Based on your estimate of 1800 cubic yards, we would pump sludge from the bottom of the lagoon at 80 gallons per minute. We would operate 12 hours per day, with the centrifuge on line 10 hours per day, and complete the pond pump out in about 12 days.

Assuming no further treatment of the supernatent liquid is called for, the liquid would be sent to sewer. The solids would be mixed with 25% fly ash, by weight, (or lime) and loaded into a lined and sealed truck, provided by others, for transportation to the disposal site. All of the above would be done by personnel wearing suitable protective equipment.

This project would take an additional five days for mobilization set up, decontamination, and demobilization, of equipment.

O. H. Materials Co.

Emergency Response and Environmental Restoration

Regional Offices: Ottawa, Illinois Atlanta, Georgia Washington, D.C. P.O. Box 551 Findlay, Ohio 45840 Telephone (419) 423-3526 1-800-537-9540

April 5, 1982

Mr. George Copeland Litton Industries 4811 W. Kearney Springfield, MO 65803

Dear Mr. Copeland:

In response to your questions, OHM is pleased to provide the following information to describe the normal steps for centrifugation and disposal of waste:

1.0 Characterization and Treatment of Waste

- 1.1 Determine applicability of centrifuge to concentrate waste (laboratory and pilot plant testing).
- 1.2 Contact landfills to determine acceptable form of waste for disposal (percentage of moisture limits, etc.)
- 1.3 Assess water quality discharge criteria and determine disposition of liquid waste.
- 1.3.1 Design additional water treatment, if required.

2.0 Site Assessment

- 2.1 Survey available work areas and plan equipment locations and, traffic flow.
- 2.2 Determine most cost effective power supply.
- 2.3 Plan for secure holding of concentrated waste prior to disposal.
- 2.4 Finalize treatment and disposition of centrifuge water.
- 2.4.1 Determine analytical and sampling requirements.
- 2.5 Finalize methods of extracting sludge from lagoon (or other) to centrifuge.
- 2.6 Survey available services and/or equipment from customer and interface.

3.0 Mobilization and Setup

- 3.1 Mobilize equipment to customer's site.
- 3.2 Set up equipment according to previous planning. The following process steps outlined in Figure 1 are included as required.

- 3.3 Set up waste holding areas, if needed.
- 3.4 Finalize disposal arrangements.
- 3.5 Set up analytical and sampling programs

4.0 Operation

- 4.1 After optimizing all process steps, start continuous operation.
- 4.2 Solid waste to be removed from site as soon as possible to minimize storage.
- 4.3 Sample and analyze water from centrifuge as required.
- 4.4 Final scraping of lagoon with equipment as required.

5.0 Teardown and Cleanup

- 5.1 Remove equipment from customer's site.
- 5.2 Restore site as required.

Please contact me or John Copus if additional information is needed.

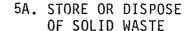
Very truly yours,

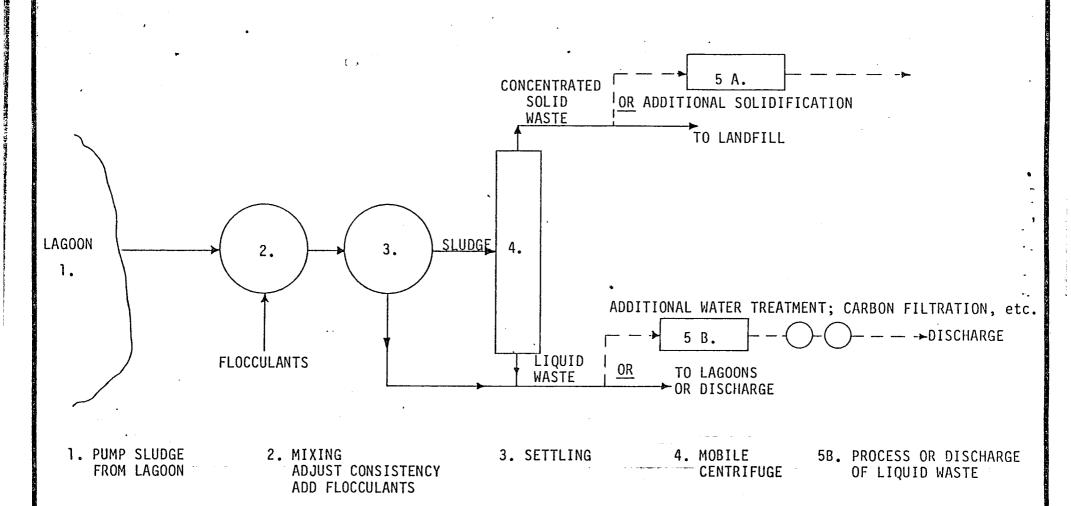
Robert J. Ohneck

Director, Project Engineering

RJO:sg

cc: #100.261





— — — OPTIONAL PROCESSES AS REQUIRED

SCALE DRAWING DATE REVISION BY NO. NONE MHB PROCESS FLOW SCHEMATIC EMERGENCY RESPONSE AND ENVIRONMENTAL RESTORATION DATE CHECKED MOBILE CENTRIFUGATION 4-05-82 BOX 551 418-423-3526 FINOLAY, OHIO 800/537-9540 PROJECT DRAWING REVISION SHEET__OF_

APR 7 1982

I.D.NO. MCDC07152903

Mr. James K. Dow Director Technical Services Litton Advanced Circuitry P.O. Box 2847, Commercial Station Springfield, Missouri 65803

Dear Mr. Dow:

We have reviewed the closure plan submitted on March 17, 1982, for closure of the surface impoundment at the Springfield, Missouri facility. Closure of interim status hazardous waste management facilities is to be conducted in accordance with requirements contained in the July 1, 1981, 40 Code of Federal Regulations (CFR), Part 265, Subpart G, Closure and Post-Closure. Review of the closure plan resulted in the following comments:

- 1. In light of the recently issued Emergency Resource Conservation and Recovery Act (RCRA) permit and the corresponding remedial action, the closure plan should be revised to reflect the impact of this activity upon final closure of the facility.
- 2. The closure plan should describe hazardous waste management activities at the site and the steps necessary to close the facility. Therefore, the closure plan should contain a general information section describing the facility size, volume of impoundment, type of treatment and dredging operations.
- 3. The closure plan must include an estimate of the maximum inventory of waste in the storage surface impoundment at any given time during the life of the facility.
- 4. A schedule for final closure should be included in the closure plan. For surface impoundments in which wastes are removed at closure, the schedule of final closure activities should include:
 - a. Final date for accepting wastes in surface impoundment;
 - b. Date all treatment is completed;
 - c. Date that all standing liquids will have been removed;
 - d. .Date that all sludge will have been removed;

Per conversation

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	_			CONCURRENCE	ES		.,	·
SYMBOL	PMTS	PMTS	PMTS	WMBR	ARW	M A	RWM	RGAD
SURNAME	Karnoy	Degher	Harrin	ton Mourby	y Spra	tlin Wa	goner WER	
DATE .	4-1-82		4-1-32	4282	M)	3417	4 /82
EPA Form 1	320-1 (12-70)			(IXI)		·	OFFIC	IAL FILE COPY

- e. Final date facility is decontaminated;
- f. Final date of closure, date that closure has been certified by professional engineer;
- ong. Total time required to close the facility;
 - h. Justification if closure will take longer than six months from the date of final acceptance of wastes.
- 5. Since all standing liquids will be discharged to the publicly owned treatment works (POTW), Litton must comply with the Clean Water Act. Upon removing the sludge from the surface impoundment, Litton will become a generator of hazardous waste and must manage it in accordance with applicable portions of Parts 262, 263 and 265 of the July 1, 1981, CFR.

Will the sludge be tested to determine if it is a hazardous waste?

- 6. The closure plan should include a description of procedures for decontaminating equipment, soil and cleaning wastes and residues.
- 7. The closure plan must include provisions for groundwater monitoring throughout the closure period until certification. Groundwater monitoring shall be in accordance with requirements contained in Section 265.90 of the regulations referenced above. The closure plan should include a copy of the groundwater sampling and analysis plan.
- 8. When closure is complete, certifications must be submitted from the owner or operator and an independent registered professional engineer certifying that closure was completed in accordance with the approved closure plan. The owner or operator should estimate the number of site inspections and include this information in the closure plan.

We have enclosed a sample closure plan outline and sample closure cost estimating worksheets for your use in revising the closure plan and developing a more detailed closure cost estimate. The cost factors contained in the cost estimating worksheets are for example purposes only.

Any questions regarding the closure plan should be referred to Karen Flournoy of my staff at 816/374-6531.

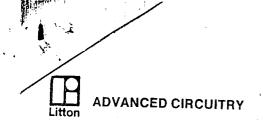
Sincerely yours,

John J. Franke Regional Administrator

Enclosures

cc: Paul Meiburger, MDNR

bcc: Michael Sanderson, AWCM



146 4/2 CONT: Orig: ARWAY

P. O. Box 2847, Commercial Station, Springfield, Mo. 65803 417 862-0751

MOD007152903

March 17, 1982

Mr. John Franke, Jr.
Regional Administrator
Environmental Protestion Agency
324 E. 11th
Kansas City, Missouri 64106

Mr. Franke:

Enclosed is the specification for the plan closure of Litton's on-site lagoon as required by Section 265.112 "Closure; Admendments of Plan" of the Federal Register.

Please review and contact me concerning any modifications that you feel necessary.

Very truly yours,

James K. Dow

Director Technical Services

JKD/cm

Enclosures



265.93 Preparation and Evaluation and Response

See 265.9

265.94 Recordkeeping and Reporting

Subpart G - Closure and Post Closure

265.111 Closure and Post-Closure

A. Owner shall close facility in a manner to minimize all hazards.

265.112 Closure Plan

- A. On or about March, 1982, the city sewer system will be available for partial hook-up and Litton will begin use for effluent discharge. At this time, Litton will split its discharge of effluent waters to A-pond and the sewer. At the present percolation rate, allowing for rain, and assuming a drop in the head pressure with the level, percolation will continue for approximately 300 days. This would put the start of disposal at about January 1, 1983. There is a possibility of earlier disposal if the city allows Litton to discharge from "A-pond" to the sewer in an effort to drop its level at a faster rate.
 - B. Based on calculations approximately 1600 cu. yds. of sludge will have accumulated and will be removed to a hazardous waste site. This material will be removed with heavy equipment and handled per contract by O. H. Materials.
 - C. Decontamination of equipment will include washdown within the pond itself and dewatering of waste through our filter press. This material will also be shipped via our normal process to the landfill per O. H. Materials.
 - D. Actual closure will start in January and take approximately two months of excavation and loading time. Final closure will consist of grading over and seeding of the site.
 - E. In lieu of the above, ACD is investigating methods for rendering the sludge non-hazardous. In the event ACD is successful, we would submit a modified closure plan.
 - F. This plan must be submitted to the Regional Administrator 180 days before beginning of closure.

- 265.113 Time Allowed for Closure
 - A. Closure is to take place within 90 days of last receipt of wastes.
 - B. We may apply to Regional Administrator for longer closure time.
- 265.114 Disposal or Decontamination of Equipment
 - A. All equipment and structures used in closure shall be properly disposed of or decontaminated.
- 265.115 Certification of Closure
 - A. Upon closure, Litton shall submit to the Regional Director certification thereof signed by the operator and a professional registered engineer.

Subpart H - Financial Requirements

- 265.142 Cost Estimate for Facility Closure
 - A. Litton has developed closure costs for facilities of \$200,000 per contract.
 - B. Costs to be updated each year using an inflation factor derived from the Annual Implied Price Defiator for GNP.

Subpart K - Surface Impoundments

- 265.222 General Operating Requirements
 - A. Operation of lagoons shall be maintained 2 feet below runover.
 - B. All dams, dikes, and walls shall have grass covering.
 - C. Operating level shall be recorded daily.
 - D. Dikes, walls, and vegetation shall be inspected for leaks, deterioration, or failure weekly.
- 265.228 Closure
 - A. Litton shall remove:
 - 1. Standing liquids
 - 2. Waste and waste residue
 - 3. Underlying and surrounding contamination soil

Emergency Response and Environmental Restoration

Regional Offices: Ottawa, Illinois Atlanta, Georgia Washington, D.C. P.O. Box 551 Findlay, Ohio 45840 Telepnone (419) 423-3526 1-800-537-9540

January 26, 1982

Mr. George Copeland Facilities Manager Litton Advanced Circuitry 4811 West Kearney Springfield, MO 65803

Dear Mr. Copeland:

For this project, we recommend using our Sharples P 5000 Horizontal Super-D Canter as the most cost-effective method of disposing of the pond's sludge contents.

Laboratory tests on samples provided by Litton indicated that the original material containing 10% solids (1 part solid - 9 parts water) could be readily centrifuged. Centrifugation resulted in products containing 50% solids (1 part solid - 1 part water) and a clear supernatent liquid (8 parts water).

Based on past experience, this 50% solid material plus 25% fly ash, or lime, should easily meet landfill requirements for a solid material.

Based on your estimate of 1800 cubic yards, we would pump sludge from the bottom of the lagoon at 80 gallons per minute. We would operate 12 hours per day, with the centrifuge on line 10 hours per day, and complete the pond pump out in about 12 days.

Assuming no further treatment of the supernatent liquid is called for, the liquid would be sent to sewer. The solids would be mixed with 25% fly ash, by weight, (or lime) and loaded into a lined and sealed truck, provided by others, for transportation to the disposal site. All of the above would be done by personnel wearing suitable protective equipment.

This project would take an additional five days for mobilization set up, decontamination, and demobilization, of equipment.

Based on the above, we estimete costs as follows:

Equipment .	33,992
Personne1	41,416
Disposal - 400 tons of material (25% fly a @ \$130/ton (trans.	
disp.)	52,000
Fly ash, 76 tons @ \$20/ton	1,500
Miscellaneous Disposables	2,500
Contingency at 10%	131,408 13,140
	\$144,548

We require a 440 volt 400 amp electrical connection to operate the centrifuge. The 400 amp load is the starting current required to bring the centrifuge up to speed. The running current will be significantly less. If necessary, we, or Litton, can supply a portable electrical gnerator to operate the centrifuge.

Actual work will be performed on a time and material basis.

Sincerely yours,

Jøhn Copus

JC/eb

DEPARTMENT OF NATURAL RESOURCES

STATE OF MISSOURI

MOPOOOOO104 Cross Ref: MODOO7152903

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Advanced Circuitry Division Litton Industries Incorporated Springfield, Missouri

No. 82-001

ORDER TO CEASE AND CORRECT

IMMINENT HAZARD

Under the authority of Section 260.420 of the Revised Statutes of Missouri 1980, the Advanced Circuitry Division, Litton Industries Incorporated, its officers, agents, employees and assigns are hereby ordered to cease the hazard created by the condition of their industrial process wastewater lagoon generally and hereinafter referred to as the "A pond", and immediately correct the imminent hazard present in an environmentally safe manner approved by the Department of Natural Resources.

The imminent hazard is created by:

- a. The presence of toxic and hazardous materials in the aforementioned
 "A pond";
- b. The unstable condition of the "A pond" barms;
- volume of liquid and sludges contained in the "A pond" is Knrst topography, as evidenced by the presence of sinkholes and a recently occurring sinkhole immediately adjacent to the "A pond" berm, and;
- The sinkholes cause a direct connection between the land surface aforementioned and the groundwater system of the area which includes caverns and caves, springs and private drinking water supplies.

Department of Natural Resources declares that the Advanced Circuitry Division,
Litton Industries, Inc. has created an imminent hazard which may cause carlous
environmental harm and hereby orders such hazard to cease ismediately.

Ordered this 18th day of March 1982

<u>Stalady</u>

Fred A. Lafser, Director Missouri Department of Natural Resources

Copy of the foregoing served by Certified Mail to:

Ron Enos, President Advanced Circuitry Division Litton Industries Incorporated P. O. Box 2847, 4811 W. Kearney Springfield, Missouri 65803

on this 18th day of March 1982

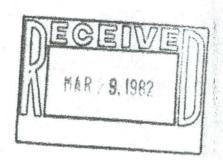
Attention: Ed Downey
Broadway Building
Jefferson City, Missouri 65101

Mr. John Nixon Springfield Regional Office 1155 East Cherokee Street Springfield, Missouri

Waste Management Program
Missouri Department of Natural Resources
P. O. Box 176 :
Jefferson City, Missouri 65102

March 26, 1982

Mr. Ron Enos, President Advanced Circuitry Division, Litton Industries Inc. P. O. Box 2847, 4811 West Kearney Springfield, Missouri 65803



Dear Mr. Enos:

The Department of Natural Resources is hereby issuing an emergency directive to Advanced Circuitry Division of Litton Industries, hereinafter referred to as Litton ACD, in accordance with 10 CSR 25-7.011 (2) (F).

This order is effective immediately and replaces the emergency directive dated March 19, 1982.

The Department of Natural Resources is hereby advising Litton ACD that a catastrophic sinkhole collapse could occur in the bottom of Pond A at any time. If this occurs, the total contents of Pond A, including wastewater and hazardous sludge, would be discharged directly to the groundwater. To minimize the chances of this hazard occurring, Litton ACD is hereby authorized and directed to take the following actions:

- 1) Litton ACD shall discharge as much wastewater as possible and acceptable to the Springfield city sewer until all liquid portions are removed from Pond A.
- 2) As an alternate to the Paragraph (1), and as may be necessary to empty the lagoon, wastewater from Pond A shall be applied by spray irrigation on Litton ACD property (30 acres more or less available for spray irrigation) at a rate of approximately one-third inch per day.
- 3) Wastewater shall not be applied directly to any known sinkholes on the property.
- 4) Removal of the liquid portion of the lagoon reduces the danger of a catastrophic collapse of Pond A. However, hazardous sludge and contaminated soil will remain in the lagoon bottom posing a threat to groundwater if a sinkhole should develop in the lagoon bottom. For that reason, Litton ACD is hereby ordered to submit to the Waste Management Program, for approval, a revised closure plan specifically addressing removal of the sludge and contaminated soil. This plan shall include a revised timetable and shall be submitted by April 15, 1982.
- 5) Litton ACD shall report to DNR Springfield Regional Office on a daily basis advising DNR of their progress. A log of all actions taken by Litton regarding this project shall be maintained and provided DNR on a weekly basis.

EPA-ARHM/HAZM

MAR 2 9 1982

Christopher S. Bond Governor Fred A Lasser Director

Region VII K.C., MC Division of Environmental Quality Robert J. Schreiber Jr., P.E. Director

MISSOURI DEPARTMENT OF NATURAL RESOURCES P.O. Box 1368 2010 Missouri Blvd. Jefferson City, Missouri 65102 (314) 751-3241

Ron Enos -March 26, 1982 Page 2

6) Litton shall not take any action not expressly specified in this directive unless prior approval is given by DNR. The Department can be reached in the event of an emergency at (314)634-2436 (24 hour number).

This emergency directive will expire on April 30, 1982 unless the Department of Natural Resources finds it necessary to terminate it sooner in order to protect human health or the environment. This directive does not preclude Litton ACD from complying with other state or federal laws and regulations.

Sincerely,

Robert J. Schreiber, Jr., P. El
Director

Division of Environmental Quality

RJS/vlw Downey, Attorney General's Office
U. S. Environmental Protection Agency, Region VII
Water Pollution Control Program
Springfield Regional Office
Waste Management Program
Laboratory Services Program

March 26, 1982

CERTIFIED MAIL P26 0335887

MOP000000104

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- 1) Litton ACD shall discharge as much wastewater as possible and acceptable to the Springfield city sewer until all liquid portions are removed from Pond A.
- 2) As an alternate to the Paragraph (1), and as may be necessary to empty the lagoon, wastewater from Pond A shall be applied by spray irrigation on Litton ACD property (30 acres more or less available for spray irrigation) at a rate of approximately one-third inch per day.
- 3) Wastewater shall not be applied directly to any known sinkholes on the property.
- 4) Removal of the liquid portion of the lagoon reduces the danger of a catastrophic collapse of Pond A. However, hazardous sludge and contaminated soil will remain in the lagoon bottom posing a threat to groundwater if a sinkhole should develop in the lagoon bottom. For that reason, Litton ACD is hereby ordered to submit to the Waste Management Program, for approval, a revised closure plan specifically addressing removal of the sludge and contaminated soil. This plan shall include a revised timetable and shall be submitted by April 15, 1982.
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EPA-ARHM/HAZM

MAR 3 0 1982

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Ron Enos March 26, 1982 Page 2

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Sincerely,

Robert J. Schreiber, Jr., P. E.

Director

Division of Environmental Quality

RJS/vlw
cc: Ed Downey, Attorney General's Office

U. S. Environmental Protection Agency, Region VII
Water Pollution Control Program
Springfield Regional Office
Waste Manegement Program
Laboratory Services Program

ADVANCED CIRCUITRY

March 29, 1982

P. O. Box 2847, Commercial Station, Springfield, Mo. 65803 417 862-0751

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HAZAM Mile Sandain

APR 0 1 1982

Region VII K.C., MC

Mr. John J. Franke, Jr. Regional Administrator

U.S. Environmental Protection Agency

Region VII

324 E. 11th

Kansas City, Missouri 64106

RE: Emergency Resource Conservation and Recovery Act Permit #MOPO0000104

Dear Mr. Franke:

In reference to your letter dated 3/24/82, Item #7, Advanced Circuitry Division, Litton Industries during the past 10 days has tabulated roughly 33 water analysis samples of the waste water being pumped to the City of Springfield. The maximum dissolved metals content of this waste water is as follows:

Copper 12.06 ppm
Chrome 1.87 ppm
Nickel 2.51 ppm
Lead .81 ppm
Cadmium .084 ppm
Jinc .553 ppm
pH range 7.78 - 8.24

Per Federal Register 161:1857 paragraph 261.24, quote: "Maximum Concentration of Contaminants for Characteristic of EP Toxicity" - The maximum concentrations allowable are:

Chrome 5.0 mg/1 Lead 5.0 mg/1 Cadmium 1.0 mg/1

Copper, Nickel, and Zinc are unlisted Other components are not found in our samples

I hope this letter will answer any questions which you have on our waste water effluent to the city. If you have any further questions, please feel free to contact me at 417-862-0751 ext. 329.

Sincerely,

David Edwards

Facilities Manager

DE/cm

cc: Robert Morby, Region VII Chief, Waste Management Branch EPA
James K. Dow, Litton ACD



P. O. Box 2847, Commercial Station, Springfield, Mo. 65803 417 862-0781

m. Stewar

April 1, 1982

File: Leton
Emergency
Permit
Tile
5 MOPOOCOCIE

Mr. Robert Morby Chief Waste Management Branch Region VII U.S. Environmental Protection Agency 324 E. 11th Kansas City, Missouri 64106

Dear Mr. Morby:

This letter is in reference to your phone call this date to Mr. Jim Dow in reference to Cyanide readings of our lagoon.

Beginning March 27, 1982, the Cyanide readings have been on a daily basis; .10 ppm, .14 ppm, .35 ppm, .08 ppm, .12 ppm.

If you have any questions or need any other information, please feel free to contact me.

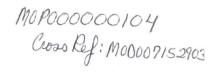
Sincerely,

David Edwards

Facilities Manager

DE/cm

Resion VII K.C., MC





P. O. Box 2847, Commercial Station, Springfield, Mo. 65803 417 862-0751

March 29, 1982

Mr. John J. Franke, Jr.
Regional Administrator
U.S. Environmental Protection Agency
Region VII
324 E. 11th
Kansas City, Missouri 64106

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Copper, Nickel, and Zinc are unlisted
Other components are not found in our samples

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Sincerely,

David Edwards

Facilities Manager

DE/cm

EPA-ARHM/HAZM

APR 0 2 1982

cc: Robert Morby, Region VII Chief, Waste Management Branch EPA VII K.C., MC James K. Dow, Litton ACD

File: Emerg Permit

RECORD OF	PHONE CALL DISCUSSION FIELD TRIP CONFERENCE
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PHONE CALL DISCUSSION FIELD TRIP CONFERENCE RECORD OF COMMUNICATION OTHER (SPECIFY) (Record of item checked above) TO: FROM: SUBJECT SUMMARY OF COMMUNICATION They have reviewed our dre have no comments. The a transmitted to them yesterday told him I appreciated the treview and that we we CONCLUSIONS, ACTION TAKEN OR REQUIRED INFORMATION COPIES